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Phone: (408) 616-6300 Fax: (408) 524-0600 30 September, 1999

Magalie Roman Salas Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Counter TWA 325 Washington, D.C. 20554

Re: Amendment of Part 15 of the Commission's Rules Regarding Spread Spectrum Devices Notice of Proposed Rulemaking ET Docket No. 99-231

Dear Ms. Salas,

I am writing on behalf of RADIOLAN, Inc. to endorse the proposals set out in the above-referenced Notice of Proposed Rulemaking. RADIOLAN, Inc. strongly supports the Commission's initiative to facilitate increased innovation and competition in the on-going development and use of spread spectrum technologies at 2.4 GHz.

Frequency hopping spread spectrum technologies are well matched for lower data rate applications. They are quite resistant to some forms of interference in this unlicensed communications band, which also is shared with such ISM devices as the ubiquitous microwave oven. Overall, frequency hopping technologies provide excellent cost/performance value.

Adoption of the Commission's proposal will mean that frequency hopping systems can more fairly access the available frequencies in the 2.4 GHz band. They will also be able to deliver higher data rates, while being backward-compatible with the installed base of existing, more narrow-band systems. Higher data rates made possible by the Commission's proposal will enable users of this band to realize additional benefits, such as faster file transfers, speedier and Internet access, Moreover, frequency hopping systems that comply with the proposed rules will not result in additional interference to existing users of the 2.4 GHz band.

For all these reasons, we urge quick adoption of the Commission's proposal in this proceeding.

Sincerely,

Dr. John B. Langley, II Chief Technical Officer RADIOLAN, Inc.